

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JANE DOE, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.

Defendant/Third-Party Plaintiff.

Case Number: 1:22-cv-10019-JSR

JPMORGAN CHASE BANK, N.A.

Third-Party Plaintiff,

v.

JAMES EDWARD STALEY

Third-Party Defendant.

**THIRD-PARTY DEFENDANT JAMES STALEY'S NOTICE OF
MOTION TO DISMISS JPMORGAN'S THIRD-PARTY COMPLAINT**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Third-Party Defendant James Staley hereby respectfully requests that the Court dismiss all claims in the Third-Party Complaint filed by Defendant JPMorgan Chase Bank, N.A. The reasons supporting Mr. Staley's motion are set forth in the corresponding Memorandum of Law.

Complying with this Court's minute order dated April 18, 2023, this response to JPMorgan's Complaint is filed by April 24, 2023. Pursuant to the same minute order, JPMorgan's response to this motion is due by May 8, 2023, Mr. Staley's reply is due by May 15, 2023, and the Court will hold a hearing at 3:00 p.m. on May 19, 2023, in Courtroom 14B.

Date: April 24, 2023

Respectfully submitted,

/s/ Brendan V. Sullivan, Jr.

Brendan V. Sullivan Jr.

Zachary K. Warren

Stephen L. Wohlgemuth

WILLIAMS & CONNOLLY LLP

680 Maine Avenue SW

Washington, DC 20024

Tel: (202) 434-5252

Fax: (202) 434-5029

zwarren@wc.com

Counsel for Third-Party Defendant

James Edward Staley